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Attorneys for Respondent (Subject E)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE VARIOUS GRAND JURY SUBPOENAS

12 Misc. 381 (WHP)

**CONCLUDING MOTION OF
SUBJECT E TO PURGE
CONTEMPT AND VACATE
CONTEMPT CITATION**

TO:

Jared Lenow, AUSA
Katherine Reilly, AUSA
U.S. Attorney's Office
One St. Andrew's Plaza
New York, NY 10007

SIR and MADAM:

PLEASE TAKE NOTICE that the undersigned attorneys for Subject E hereby bring a motion before the Hon. William H. Pauley, III, U.S.D.J., returnable on or before April 27, 2017, to conclude this proceeding with purgation of the contempt judgment and citation imposed against Subject E by Order of the Court dated January 24, 2017 (Doc. #60).

PLEASE TAKE FURTHER NOTICE that, in support of this Motion, the undersigned relies upon a memorandum of law and Declaration of Alain Leibman in Support of Concluding Motion to Purge.

PLEASE TAKE FURTHER NOTICE that oral argument is not requested.

PLEASE TAKE FURTHER NOTICE that if the Court enters any but a purgation order in response to this concluding motion, then we respectfully move the Court to stay that order to allow Respondent to seek review in the Court of Appeals for what we submit would be evident error.

FOX ROTHSCHILD LLP
Attorneys for Respondent (Subject E)

DATED: April 17, 2017

By:



ALAIN LEIBMAN
Bar # AL8971

CERTIFICATE OF SERVICE

I hereby certify that on this date the within Motion, supporting memorandum of law, and Declaration were served upon by Government via ECF, and that copies of all papers were served upon the Government via email to the following persons:

Jared Lenow, AUSA
Katherine Reilly, AUSA

FOX ROTHSCHILD LLP
Attorneys for Respondent (Subject E)

DATED: April 17, 2017

By:



ALAIN LEIBMAN
Bar # AL8971